

UNITED STATES OF AMERICA
IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED

January 19, 2021 8:43 AM
CLERK OF COURT
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: mkc SCANNED BY: JW /1-19

LARRY DARNELL JONES
**(ON BEHALF OF CHARDIAY CHARTESS BARNES-JONES,
AN INCAPACITATED PERSON WHO IS PARALYZED,**
Plaintiffs,

v.

1:21-cv-51

Robert J. Jonker
Chief U.S. District Judge

HON:
Docket No.

Motion to File Instanter

DEFENDANT BENJAMIN HESS, #045046 NO. 1., IS BEING SUED IN HIS
INDIVIDUAL COMPACITY AS DEPUTY SHERIFF FOR CALHOUN COUNTY MICHIGAN
LOCATED AT 315 W GREEN ST, IN MARSHALL, MI 49068;

DEFENDANT JOHN DOE, 1377 NO. 2., IS BEING SUED IN HIS
INDIVIDUAL COMPACITY AS OFFICER FOR CALHOUN COUNTY, EMETT TOWNSHIP,
MICHIGAN LOCATED AT 450 BAY ST, IN PETOSKEY, MI 49770;

DEFENDANT JOHN DOE, 1378 NO. 3., IS BEING SUED IN HIS
INDIVIDUAL COMPACITY AS OFFICER FOR CALHOUN COUNTY, EMETT TOWNSHIP,
MICHIGAN LOCATED AT 450 BAY ST, IN PETOSKEY, MI 49770;

DEFENDANT JOHN DOE, 1315 NO. 4., IS BEING SUED IN HIS
INDIVIDUAL COMPACITY AS OFFICER FOR CALHOUN COUNTY, EMETT TOWNSHIP,
MICHIGAN LOCATED AT 450 BAY ST, IN PETOSKEY, MI 49770;

DEFENDANT KEVIN ALAN KELLEMS, NO. 5., IS BEING SUED IN HIS
INDIVIDUAL COMPACITY LOCATED AT 215 BECKWITH RD, IN BATTLE CREEK, MI
49015;

DEFENDANTS CAMILLE NAKAYLA RICHARDSON, NO. 6, IS BEING SUED IN HER
INDIVIDUAL COMPACITY LOCATED AT 411 WALLACE AVE, IN KALAMAZOO, MI
49048; AND HER INSURANCE COMPANY THE HARTFORD INSURANCE POLICY
#55PHB674312, LOCATED AT 690 ASYLUM AVE, IN HARTFORD, CT 06155

DEFENDANT MAKELA SHABREE GARRETT, NO. 7., IS BEING SUED IN HER INDIVIAL COMPACITY LOCATED AT 836 SIMPSON, IN KALAMAZOO, MI 49005

DEFENDANT MAMIE LEE HINES, NO. 8., IS BEING SUED IN HER INDIVIAL COMPACITY LOCATED AT 411 WALLACE AVE, IN KALAMAZOO, MI 49048

DEFENDANT MIKE OLSON, NO. 9., IS BEING SUED IN HIS INDIVIAL COMPACITY AS DIRECTOR OF PUBLIC SAFETY FOR CALHOUN COUNTY, EMETT TOWNSHIP, MICHIGAN LOCATED AT 617 CLIFF STREET, IN BATTLE CREEK MI. 49014

DEFENDANT LT. TONY GEIGLE, NO. 10., IS BEING SUED IN HIS INDIVIAL COMPACITY AS FIRE & EMS COMMANDER FOR CALHOUN COUNTY, EMETT TOWNSHIP, MICHIGAN LOCATED AT 3109 MAIN STREET, IN EMMETT MICHIGAN. 48022.

DEFENDANT RON SLAGEL, NO. 11., IS BEING SUED IN HIS INDIVIAL COMPACITY AS CHIEF EXECUTIVE OFFICER OF LIFECARE AMBULANCE SERVICE FOR CALHOUN COUNTY, EMETT TOWNSHIP, MICHIGAN LOCATED AT 330 HAMBLIN AVE, IN BATTLE CREEK MI. 49015

Defendants.

**LARRY DARNELL JONES
(ON BEHALF OF CHARDIAY CHARTESS BARNES-JONES,
AN INCAPACITATED PERSON WHO IS PARALYZED,
1052 CALVIN AVENUE
Muskegon, Michigan 49442
517-619-9067**

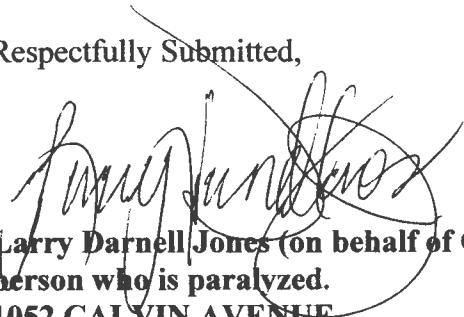
**CHARDIAY CHARTESS BARNES-JONES
10752 CHANCELLOR STREET
Portage, Michigan 49002
616-890-7916**

NOW COMES, LARRY DARNELL JONES (ON BEHALF OF CHARDIAY CHARTESS BARNES-JONES, AN INCAPACITATED PERSON WHO IS PARALYZED,
who is my biological Granddaughter, moves this Honorable Court, to grant Motion to File
Instanter.

RELIEF REQUESTED

WHEREFORE, foregoing reasons the Plaintiffs Larry Darnell Jones (on behalf of Chardiy Chartess Barnes-Jones, an incapacitated person who is paralyzed, respectfully moves this honorable court, to grant Motion to File Instanter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Larry Darnell Jones". The signature is somewhat stylized and includes a small circle containing a checkmark or similar mark.

01/18/2021

**Larry Darnell Jones (on behalf of Chardiy Chartess Barnes-Jones, an incapacitated person who is paralyzed.
1052 CALVIN AVENUE
Muskegon, Michigan 49442
517-619-9067**